

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

IN THE MATTER OF AN APPLICATION
OF THE UNITED STATES OF AMERICA
FOR A SEARCH WARRANT FOR
INFORMATION ASSOCIATED WITH
MULTIPLE FACEBOOK ACCOUNTS
RELATED TO CRIMINAL ACTIVITY IN
KENOSHA, WI

Case No. 20-398M

MOTION TO SEAL

The United States of America, by its attorneys, hereby moves the Court to seal all documents filed or issued under the above-captioned magistrate number for a period of one year. As a basis for said motion, the Government relies upon the facts set forth in the affidavit submitted in support of the application, as well as the facts set forth below:

1. In a warrant issued on September 17, 2020, this Court authorized agents to search for information associated with multiple Facebook accounts related to criminal activity in Kenosha, WI.
2. This warrant was issued based on the application of Special Agent Rick Hankins of the Bureau of Alcohol, Tobacco, Firearms and Explosives and included an affidavit to the search warrant.
3. Agents executed the search warrant on October 27, 2020.
4. The previously filed affidavit submitted in support of this application details the federal government's ongoing investigation into alleged violations of federal law in this district. As detailed in the affidavit, the Government believes that numerous targets engaged in offenses related to rioting, looting, and arson during the civil unrest in Kenosha. The

investigation to date has included the use of search warrants, grand jury subpoenas, and electronic and physical surveillance. However, this investigation is not complete. There remain several unidentified witnesses, victims, subjects, and targets.

5. Disclosure of the search warrant application, including the supporting affidavit, would prejudice the Government's ongoing investigation in this matter, in that it would alert them to law enforcement activity. This could encourage the targets to change their method of operation, making it more difficult for the Government to determine the full scope of and participants in their criminal activity.

6. Based on the foregoing, the United States respectfully requests that the Court seal the application for warrant, including the supporting affidavit, for a period of one year. This time period will allow the Government to complete its investigation, at which time the Government anticipates that appropriate criminal charges can be brought against the targets of this investigation.

A proposed order accompanies this motion.

Dated at Milwaukee, Wisconsin this 30th day of October 2020.

Respectfully Submitted,

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